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March 31, 2023

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of February 1, 2023, ECF No. 8853, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs" or "PECs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

Pursuant to the Court's March 13, 2023 Order, ECF No. 8923, the PECs intend to meet and confer with Saudi Arabia, Dallah Avco, and the FBI on or before April 14, 2023 to coordinate and streamline redaction and confidentiality issues in connection with the upcoming *Daubert* and motion to dismiss briefing. The PECs believe that this process will help inform other redaction and confidentiality issues, such as those relating to discovery material and prior motions to compel, and avoid duplicative work.

On March 31, 2023, Saudi Arabia circulated updated proposed redactions to the FBI and Plaintiffs of deposition transcripts, removing redactions of materials that were publicly released pursuant to section 2 of Executive Order 14040. Saudi Arabia also responded to Plaintiffs' January 27, 2023 email addressing redactions Saudi Arabia had previously proposed. Saudi Arabia will separately respond to Plaintiffs' January 27 and 31, 2023 emails addressing redactions to certain of the Court's orders.

As set forth in prior reports, FBI has completed its redaction review of the Plaintiffs' expert reports. FBI is currently in the process of reviewing Saudi Arabia's proposed redactions to its expert report, which is over 700 pages in length.

Dallah Avco continues to take no position on the parties' proposed redactions.

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Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before May 31, 2023.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)